

**PETITION FOR RECONSIDERATION**

**Proceeding CC Docket No. 02-6**

**File Number DA 18-786**

**Late-Filed FCC Form 471 Application**

**Transylvania County Library, BEN 127077  
212 South Gaston Street  
Brevard, NC 28712**

**FORM 471 Application Number 181015479**

**We request reconsideration of the denial of our FCC waiver request for a late-filed Form 471.**

**Our Form 471 Application Number 181015479 was filed on March 1, 2018, well before the deadline. On that date, after we filed, we received an email message from USAC stating that our Form 471 had been submitted and was “Ready for Certification”. This email message is included as an attachment to this petition. Because we are in the second year of a multi-year contract with our Internet Service Provider, Comporium, we believed that our form was awaiting certification from Comporium. On April 16, 2018, when we had heard nothing about our Form 471 being approved, we contacted the USAC help desk who told us that our Form 471 had not been submitted as we believed and that it was awaiting certification, not from our ISP, but from ourselves. We were also told that we had to file an FCC Waiver request. We immediately did as we were instructed to do and we also contacted the State Library of North Carolina for assistance. We have participated in the Universal Service program since its beginning and have had no problems for 20 years until the inception of the EPC which is confusing and extremely difficult to use. Our late-filing was due entirely to the fact that we did not understand the EPC instructions which are unclear and confusing.**

**As your website says, “The Wireline Competition Bureau works to ensure that all Americans have access to robust, affordable broadband and voice services. Its programs help ensure access to affordable communications for schools, libraries, health care providers, and rural and low-income consumers.” The Transylvania County Library is a small public library and our Southern Appalachian community depends on us to provide them with access and we need this assistance to meet their need. Therefore, we request reconsideration of our application for a waiver for a late-filed Form 471.**

**Thank you,**

**Anna Yount, Transylvania County Library Director**